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Ms Rebecca Heath  
Biosecurity Council Executive Officer  
Department of Primary Industries and Regional Development  
75 York Road  
NORTHAM WA 6401

**Submission: Sustaining a high-level biosecurity response within the Department of Primary Industries and Regional Development – Discussion Paper**

Dear Ms Heath

The Forest Industries Federation of WA (FIFWA) is the association for the timber industry in Western Australia. FIFWA is representative of almost all the major companies and businesses that operate in the WA timber industry. WA's timber industry has total gross value of annual output of about \$1.4 billion, contributing \$643 million to the WA economy each year and around 6000 jobs across regional WA<sup>1</sup>.

Biosecurity is important to WA's timber industry, where plant and soil health is key. The impact of potential biosecurity outbreaks can be particularly devastating for our industry as some marketable tree species take up to 30 years to reach maturity, in addition to carbon storage and forest ecosystem services concerns.

WA's timber industry commitment to biosecurity is exemplary. Our members have biosecurity policies and action plans. At a State level our members collaborate in undertaking forest health management and R&D activities through the Industry Plantation Management Group (IPMG). At the national level we are represented through Australian Forest Products Association (AFPA) and collaborate with Plant Health Australia (PHA). This collaboration has led to the development of the Framework for National Biosecurity Surveillance of Exotic Forest Pests<sup>2</sup> and the National Forest Biosecurity Surveillance Strategy 2018-2023<sup>3</sup> and its accompanying implementation plan<sup>4</sup>. Initial seed funding by the Department of Agriculture and Water Resources (DAWR) and AFPA has enabled the employment of the National Forest Biosecurity Coordinator (NFBC). Working at PHA the NFBC is tasked with engaging all forest biosecurity stakeholders and coordinating foundational surveillance, risk analysis and governance and funding arrangements that will enable the setting up of a National Forest Biosecurity Program.

We would encourage State government and DPIRD decision-making and responses to forest biosecurity

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<sup>1</sup> Schirmer, J., Mylek, M., Magnusson, A., Yabsley, B. and Morison, J. (2017). Socio-economic impacts of the forest industry Western Australia,. Forest and Wood Products Australia.

<sup>2</sup> Tovar, F., Carnegie, A.J., Collins, S., Horwood, M., Lawson, S. A., Smith, D., Subasinghe, R. and Wardlaw, T., (2017). Framework for National Biosecurity Surveillance of Exotic Forest Pests, Plant Health Australia

<sup>3</sup> Department of Agriculture and Water Resources. (2018). National Forest Biosecurity Surveillance Strategy, Plant Health Australia.

<sup>4</sup> Department of Agriculture and Water Resources. (2018). National Forest Biosecurity Surveillance Strategy Implementation Plan 2018-2023, Plant Health Australia

issues to include:

1. consultation with FIFWA, PHA (NFBC), IPMG, the Forest Products Commission (FPC) the Parks and Wildlife Service of WA's Department of Biodiversity, Conservation and Attractions (DBCA).
2. matching industry funding of preparedness activities as planned under the National Strategy. This has been previously communicated and is further explored in this submission.

We would like to thank you for the opportunity to comment on the discussion paper. While we are supportive of a number of initiatives in the discussion paper we also raise some concerns, particularly in relation to the need for clear State-funding arrangements.

As directed, this submission will address section four of the Discussion Paper.

## **Introduction**

FIFWA certainly agrees with Mr Ron Glanville's findings and the Biosecurity Council's experience that "industry-agency partnerships in biosecurity response are of central importance" and would welcome further collaboration. Indeed that is the basic premise of our submission, we would like State responses to forest biosecurity incursions to always include consultation with FIFWA, PHA (NFBC), IPMG, FPC and the Parks and Wildlife Service DBCA.

### **4.1 Industry engagement and partnerships**

FIFWA looks forward to the "genuine and regular engagement" proposed in the discussion paper. FIFWA agrees that industry "representation should occur at multiple levels, particularly during a cost-shared response" and that "often the relationships established before a response...are relied upon most during a response". Such statements also apply to wildfires, another threatening process for our industry.

Again, our directives apply: to always consult with all forest biosecurity stakeholders and for the State to match industry funding of preparedness activities as suggested under the National Strategy.

#### **TO WHAT EXTENT DOES YOUR INDUSTRY HAVE A FORMAL OR INFORMAL 'BIOSECURITY RESPONSE' RELATIONSHIP WITH DPIRD?**

Our industry collaborates on forest biosecurity matters with Plant Health Australia at a state level through FIFWA and a national level through AFPA. AFPA has a dedicated Forest Health and Biosecurity subcommittee that engages with the NFBC on forest biosecurity issues.

At a State level, strong historical relationships exist between the forest sector and State Agencies responsible for forest management in WA such as FPC and DBCA. Cooperation on pest and weed management and regular fire control operations has meant a good degree of communication and collaboration continues to occur.

Relationships with DPIRD are less formalised and more infrequent than what is needed to adequately address forest biosecurity.

FIFWA is encouraged to note that recently DPIRD collaborating with PHA has enabled the NFBC to be 'based' at their Bunbury offices. This bodes well for future cooperation. The position being based near major WA forest resources and operations will hopefully act as a good conduit between DPIRD and industry on biosecurity issues.

#### **HOW MIGHT RELATIONSHIPS BETWEEN DPIRD AND YOUR INDUSTRY BE ESTABLISHED AND MAINTAINED, TO ENABLE STRONG INDUSTRY ENGAGEMENT AND PARTICIPATION IN A BIOSECURITY EMERGENCY RESPONSE?**

Much of the engagement opportunities that the industry would like to see are explained in the National

Forest Biosecurity Surveillance Strategy 2018-2023<sup>5</sup> and its implementation plan<sup>6</sup>.

At a State level, DIPRD should note that FIFWA and the NFBC are currently organising a forest biosecurity discussion day early in 2019 to bring all State forest biosecurity stakeholders together. Collaboration with DPIRD for this to occur would be greatly appreciated.

PHA and FIFWA would be willing to host meetings for a WA biosecurity working group or similar if required.

## **4.2 Characteristics of DPIRD as a biosecurity combat agency**

### **CLEAR AND SUPPORTIVE LINE OF AUTHORITY**

FIFWA is generally supportive of the suggested actions, especially the recognition of biosecurity as core business for DPIRD. This is crucial not only to a smooth response, but to all aspects of the discussion paper – industry engagement and partnerships; clear and supportive line of authority; clear State-funding arrangements; concept of operations; preparedness planning; decision-making and dealing with uncertainty; intelligence; human responses; information systems; diagnostics and innovation; communications; recovery; and agency business continuity. Without this recognition, the ideas proposed in this discussion paper will not be realised because mindsets will not change and adequate funding will not be allocated.

In relation to the following quote:

*“Ensuring affected industries and other key stakeholders are engaged, and are part of the authorising environment where appropriate, especially if they are contributing to the cost of the response.”*

FIFWA submits the need for clarification of funding structures for biosecurity initiatives especially for preparedness activities that drive prevention of incursions. This remains a primary concern to WA’s timber industry. We request that the State match proposed industry funding of preparedness activities as outlined under the national Strategy.

### **CLEAR STATE-FUNDING ARRANGEMENTS**

As previously communicated, FIFWA is supportive of clarification of the structure of biosecurity response funding. This sub-section is of utmost importance to our members and we would welcome further contact on this matter.

FIFWA is tentatively supportive of the final sentence:

*“Discussions should be held with industry to define criteria, circumstances and arrangements for cost-sharing State-based responses.”*

However, in order for real change to be achieved, FIFWA suggests that “should” be replaced with “must”.

### **CONCEPT OF OPERATIONS**

While FIFWA agrees that DPIRD needs a clear concept of operations, the bullet points that follow need refining. Currently they are vague and redundant - they can all be distilled into the first sentence stating that the “response will follow AIIMS principles”.

Further, if biosecurity is indeed recognised as core business for DPIRD then again “must” is more appropriate than “should”.

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<sup>5</sup> Department of Agriculture and Water Resources. (2018). *National Forest Biosecurity Surveillance Strategy*, Plant Health Australia.

<sup>6</sup> Department of Agriculture and Water Resources. (2018). *National Forest Biosecurity Surveillance Strategy Implementation Plan 2018-2023*, Plant Health Australia

## **PREPAREDNESS PLANNING**

FIFWA is supportive of policies that are contextualised for Western Australia, and of preparedness planning that is transferable to incursions of a range of species.

## **DECISION MAKING AND DEALING WITH UNCERTAINTY**

Once again, the inclusion of “must” rather than “should” would be welcomed in this subsection that deals with uncertainty.

FIFWA agrees that “Industry advice can be critical here” and once more welcomes the opportunity to collaborate by providing any information that may assist the decision-making process.

## **INTELLIGENCE**

The recognition of biosecurity as core business is particularly applicable in this subsection, especially in terms of “Encouraging a culture where staff keep the bigger picture in mind and pass on information”.

## **HUMAN RESOURCES**

Many of the suggestions in this subsection will only be achieved if funding structures and arrangements are fully clarified.

FIFWA represented WA’s timber industry at the Western Australia Biosecurity Roundtable on July 4 2018. Human resources was an important topic on our table and indeed much of the forum recognised WA’s comparative lack of experts and university research on a global scale. As you are aware, one of the highlighted statements from the WA Roundtable was the need to ensure a continuing supply of relevant scientific specialists into the future. Much work needs to be done to address the issue, before the bullet point suggesting that “staffing will need to be supplemented from a broader resourcing base” can be achieved.

## **INFORMATION SYSTEMS**

FIFWA is wary of a top down approach to the development and design of new corporate systems. Industry input must be included in information system development and design to ensure that it is practical for use in the field, especially in emergency situations where users may be performing unfamiliar tasks. Too often, information systems are designed in the office to capture data in the field which leads to inefficiencies and frustrations. Similarly, increased paperwork will not be welcomed.

The current National Forest Biosecurity Surveillance Strategy envisions a plan wherein industry will increasingly provide biosecurity surveillance data to assist with market access requirements and or early detection. Therefore industry involvement is required to ensure new corporate systems are designed in a way to benefit all users.

## **DIAGNOSTICS AND INNOVATION**

This is another key area where resources are required, especially regarding the expansion of research and capacity building. Again, this links to the discussions held at the WA Roundtable and highlights the need to allocate funds to ensure a continuing supply of relevant scientific specialists into the future.

As above, the current National Forest Biosecurity Surveillance Strategy envisions a plan wherein industry will increasingly provide biosecurity surveillance data to assist with market access requirements and or early detection. For this to occur it will have to be supported by strong diagnostic capacity within the State.

## COMMUNICATIONS

This prompted much discussion at the WA Roundtable. The subsection here is brief and FIFWA encourages The Council to recommend that DPIRD fully detail the communications plan for biosecurity response.

## RECOVERY

Recovery is particularly important for the timber industry, where some crops can take up to 30 years to mature. FIFWA is most concerned with the bullet points that address facilitating recovery of market access and direct assistance measures such as compensation for property destroyed.

Recovery is complex for the timber industry with short and long term considerations. Impacts of exotic pest introductions that are not commonly calculated on a dollar basis include the costs related to the reduction of forest ecosystem services such as increased soil erosion; localised flooding; reduced carbon sequestration; reductions in habitat and diversity within ecosystems; and impacts on amenity and tourism<sup>7</sup>.

## AGENCY BUSINESS CONTINUITY

FIFWA is supportive of all actions that clarify the level of resources required.

## Summary

Biosecurity is important to WA's timber industry and FIFWA generally supports the intent of the discussion paper which seeks to ensure that DPIRD and industries can work together in a true partnership to address biosecurity issues. The most important from our perspective are:

- Recognising that biosecurity is DPIRD core business, and includes forest biosecurity for plantations, native forest and amenity/urban forests
- There is a need for ongoing capacity building
- There is a need to clarify funding arrangements
- DPIRD and industry partnerships will only work if there is more industry involvement in decision-making and planning.

It bears repeating that at a strategic level we would like State responses to forest biosecurity incursions to always include consultation with FIFWA, PHA (NFBG), IPMG, FPC and DBCA. We would also like the State to become more actively involved in the preparedness activities outlined under the National Forest Biosecurity Surveillance Strategy. As previously communicated, collaboration with DPIRD to organise a forest biosecurity discussion day early in 2019 would also be welcomed.

If required, we are more than willing to provide additional information or answer any questions DPIRD or the Biosecurity Council may have in respect to this industry submission, particularly regarding State-funding arrangements.

Yours sincerely



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<sup>7</sup> Department of Agriculture and Water Resources. (2018). *National Forest Biosecurity Surveillance Strategy Implementation Plan 2018-2023*, Plant Health Australia